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**PURPOSE
AND NEED
FOR ACTION**

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2.1 The Proposed Action

NMFS proposes to implement Limit 10 of the July 10, 2000, ESA section 4(d) rules, and thereby implement an additional management tool for the conservation of 14 ESUs of threatened salmonids (subsection 3.4, Alternative 2 - Proposed Action).

2.2 Purpose and Need

NMFS intends to develop innovative, efficient, and cooperative ways to review and approve RRM programs to protect and conserve threatened salmonids in accordance with the ESA and the National Oceanic and Atmospheric Administration's (NOAA) Strategic Plan (described below).

The first obligation for NMFS is to conserve the species with whose care it is entrusted. A main purpose of the ESA is to "provide a program for the conservation of threatened . . . and endangered species." Therefore, NMFS must ensure that any program or action that could adversely affect listed species is conducted so that it contributes to listed species conservation. Because RRM programs have the potential to harm listed species, NMFS must ensure that if such activities go forward, they are conducted in a manner that is consistent with the conservation of listed species. Analyzing and approving a proposed RRM program under Limit 10 would provide NMFS with an additional method for conserving listed species by ensuring that RRM activities comply with the Limit 10 criteria, and by increasing options for addressing ESA mandates, which may foster further cooperative efforts with state, county, city, and port entities.

The second obligation for NMFS is to be responsive to the needs of its constituents. In this instance, the public in the Pacific Northwest and California have requested greater involvement in the administration of programs designed to conserve listed species. NOAA has responded to this need by stating that its agencies (including NMFS) must find new and cooperative ways to recover and maintain protected species populations (NOAA 1997a). One of the strategies NOAA has adopted for meeting this objective is to "establish cooperative working relationships with government and non-government entities, both foreign and domestic, to promote conservation of protected resources." The proposed action is designed to promote this strategy in the realm of RRM programs. It is also designed to engage state, county, city, and port entities in cooperative efforts at every level of NMFS' processes for evaluating and approving RRM programs. Consequently, the proposed action would fulfill NOAA's vision of establishing "trust and respect among all NOAA constituents and customers" (NOAA 1997).